

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**IN RE: ASBESTOS PRODUCTS
LIABILITY LITIGATION**

MDL DOCKET NO. 875

**GRADY O. HUMPHREYS, et al., vs.
A.O. SMITH ELECTRICAL
PRODUCTS COMPANY, et al.**

THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA

GRADY O. HUMPHREYS, et al.,

Plaintiffs,

vs.

**CIVIL ACTION NO.
2:07-CV-607-WKW**

ASBESTOS DEFENDANTS:

**A. O. SMITH ELECTRICAL PRODUCTS
COMPANY, a division of A.O. SMITH
CORPORATION, et al.,**

Defendants.

/

**JOINDER AND ADOPTION IN AMERICAN OPTICAL CORPORATION'S MOTION
TO DISMISS OR, IN THE ALTERNATIVE, MOTION FOR MORE DEFINITE
STATEMENT AND/OR MOTION FOR SEVERANCE**

COMES NOW Defendant Bayer Cropscience, Inc. F/K/A Aventis Cropscience USA, Inc. (F/K/A Rhone Poulenc Ag Company, Inc. F/K/A Rhone Poulenc, Inc., F/K/A Union Carbide Agricultural Products, Inc. F/K/A Amchem Products, Inc., A Successor To Benjamin Foster Company) and hereby joins in and adopts as though fully set forth American Optical Corporation's Motion to Dismiss or, in the Alternative, Motion for More Definite Statement and/or Motion for Severance filed herein on February 18, 2008.

WHEREFORE, for all the arguments, citations to authority and for all other grounds the court deems applicable, Defendant Bayer Cropscience, Inc. F/K/A Aventis Cropscience USA, Inc. (F/K/A Rhone Poulenc Ag Company, Inc. F/K/A Rhone Poulenc, Inc., F/K/A Union Carbide Agricultural Products, Inc. F/K/A Amchem Products, Inc., A Successor To Benjamin Foster Company)respectfully request this Honorable Court to grant American Optical Corporation's Motion to Dismiss or, in the Alternative, Motion for More Definite Statement and/or Motion for Severance filed herein and to further grant all additional relief this Honorable Court deems necessary and proper.

Respectfully submitted this 18th day of March, 2008.

HAWKINS & PARNELL, LLP

/s/ Evelyn M. Fletcher
Evelyn M. Fletcher (FLE 019)
AL Bar No. ASB-1485-C19E
Elizabeth B. Padgett (PAD015)
Alabama Bar No. ASB-3936-C60P

Counsel for Bayer Cropscience, Inc.

4000 SunTrust Plaza
303 Peachtree Street, N.E.
Atlanta, GA 30308-3243
404/614-7400

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this date served the foregoing on all counsel by electronic filing and served Plaintiffs' counsel at the following address by U. S. Mail, with proper postage affixed:

G. Patterson Keahey, Jr.
Law Offices of G. Patterson Keahey, P.C.
One Independence Plaza, Suite 612
Birmingham, AL 35209

This 18th day of March, 2008.

HAWKINS & PARNELL, LLP

/s/ Evelyn M. Fletcher
Evelyn M. Fletcher (FLE019)
AL Bar No. ASB-1485-C19E
Elizabeth B. Padgett (PAD 015)
Alabama Bar No. ASB-3936-C60P

Counsel for Bayer Cropscience, Inc.

4000 SunTrust Plaza
303 Peachtree Street, N.E.
Atlanta, GA 30308-3243
404/614-7400